

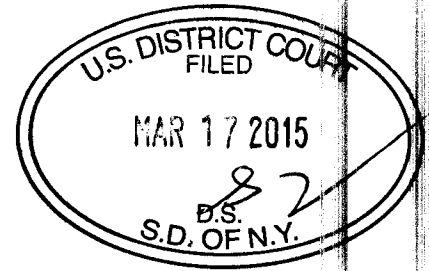
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Approved:

ROBERT ALLEN
Assistant United States Attorney

Before: THE HONORABLE DEBRA FREEMAN
United States Magistrate Judge
Southern District of New York



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COMPLAINT

UNITED STATES OF AMERICA

:

Violations of

- v. -

: 21 U.S.C. § 846

ABDOULAYE DIALLO
a/k/a "Jallo,"

: COUNTY OF OFFENSE:
NEW YORK

Defendant.

:

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SOUTHERN DISTRICT OF NEW YORK, ss.:

RANDALL R. PETERS, a Special Agent with the Drug Enforcement Administration, being duly sworn, deposes and states:

COUNT ONE

1. From at least in or about January 2015 up to at least in or about March 2015, in the Southern District of New York and elsewhere, ABDOULAYE DIALLO, a/k/a "Jallo," the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that ABDOULAYE DIALLO, a/k/a "Jallo," the defendant, and others known and unknown, would and did distribute and possess with intent to distribute controlled substances in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that ABDOULAYE DIALLO, a/k/a "Jallo," the defendant, conspired to distribute and possess with intent to distribute was mixtures or substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Section 846.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

4. I am a Special Agent with the Drug Enforcement Administration ("DEA"), and I am one of the agents with primary responsibility for the investigation of this case. This affidavit is based upon my own observations, my conversations with other law enforcement agents and others, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

5. During the course of this investigation, DEA agents and I have worked with a cooperating witness (the "CW").¹ Based on my conversations with the CW, I have learned, in substance and in part, the following:

a. ABDOULAYE DIALLO, a/k/a "Jallo," the defendant, resides in an apartment located in a building in the vicinity of 1917 7th Avenue, New York, New York (the "Apartment").

b. DIALLO has sold quantities of heroin to the CW in the past.

6. On or about March 17, 2015, DEA agents conducted a search of the Apartment (the "Search") pursuant to a judicial warrant. Based on my conversations with the agents who conducted search, I have learned that the agents discovered a quantity of a brown powdery substance in the Apartment. The agents conducted a

1 The CW is cooperating with law enforcement in hopes of receiving a cooperation agreement with respect to pending charges against the CW. Information provided by the CW has proven reliable and has been corroborated in part by physical surveillance by DEA agents, conversations recorded by the CW, and controlled purchases of narcotics, among other things.

field test of the substance, which tested positive for the presence of heroin.

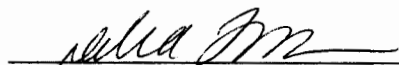
7. ABDOULAYE DIALLO, a/k/a "Jallo," the defendant, was arrested after the Search. DIALLO was read and waived his Miranda rights. DIALLO told law enforcement, in substance and in part, that the heroin recovered during the Search belonged to DIALLO.

WHEREFORE, I respectfully request that ABDOULAYE DIALLO, a/k/a "Jallo," the defendant, be imprisoned, or bailed, as the case may be.



RANDALL R. PETERS
Special Agent
Drug Enforcement Administration

Sworn to before me this
17th day of March, 2015



THE HONORABLE DEBRA FREEMAN
United States Magistrate Judge
Southern District of New York